



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

DEC 17 2015

PROMPT REPLY NECESSARY

**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

Article Number: 7015 0640 0001 0675 4398

Mr. Edward J. Canning  
Global Environmental Health and Safety (EHS) Manager  
Saint-Gobain Performance Plastics Corporation  
14 McCaffrey Street  
Hoosick Falls, New York 12090

Re: Saint-Gobain Performance Plastics Corporation  
Request for Information Pursuant to the Comprehensive Environmental Response,  
Compensation, and Liability Act, 42 U.S.C. § 9601 et seq.

Dear Mr. Canning:

The U.S. Environmental Protection Agency ("EPA") is charged with responding to the release or threat of release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA" or the "Superfund law"), 42 U.S.C. §§ 9601-9675. [www.epa.gov/superfund/action/law/index.htm](http://www.epa.gov/superfund/action/law/index.htm).

Under Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), EPA has broad information gathering authority which allows EPA to require persons to provide information and/or documents relating to materials generated, treated, stored, or disposed of at or transported to a facility, the nature and extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a facility and information relating to the ability of a person to perform a cleanup.

This letter seeks your cooperation in providing information and documents relating to all Saint-Gobain Performance Plastics Corporation (SGPP) operations located in or within a fifteen mile radius of, Hoosick Falls, New York including the SGPP facilities located at 14 McCaffrey Street and 1 Liberty Street, and the release or threat of release of hazardous substances or pollutants or contaminants at or from those facilities or operations. A complete and truthful response should be provided to the attached Request for Information **within 45 days** of your receipt of this letter.

While EPA seeks your company's cooperation in this investigation, compliance with the Request for Information is required by law. When the company has prepared its response to the Request for Information, please have the enclosed "Certification of Answers to Request for Information" signed and notarized and return that Certification to EPA with the response. Please note that false, fictitious, or fraudulent statements or representations may subject the company to civil or criminal penalties under federal law. In addition, Section 104(e) authorizes EPA to pursue penalties for failure to comply with Requests for Information.

If you have information about other parties who may have information regarding the enclosed Request, that information should be submitted within the time frame noted above.

Please note that if after submitting your response you obtain additional or different information concerning the matters addressed by our Request for Information, it is necessary that you promptly notify EPA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

Some of the information EPA is requesting may be considered by the company to be confidential. Please be aware that the company may not withhold the information on that basis. If the company wishes EPA to treat such information confidentially, it must advise EPA of that fact by following the procedures outlined in the enclosed instructions, including the requirement for supporting its claim for confidentiality.

See the enclosed Instructions for information on how to respond to the enclosed questions and/or information requests. Your response to this Request for Information should be mailed to:

Nicoletta M. DiForte  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency - Region II  
290 Broadway, 19<sup>th</sup> Floor  
New York, NY 10007-1866

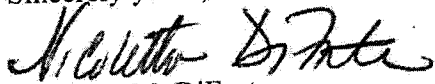
with a copy to:

Amy Chester  
Assistant Regional Counsel  
Office of Regional Counsel  
U.S. Environmental Protection Agency - Region II  
290 Broadway, 16th Floor  
New York, NY 10007-1866

If you have any questions regarding this Request for Information, please have your attorney contact Amy Chester of EPA at (212) 637-3213.

We appreciate and look forward to your prompt response to this information request.

Sincerely yours,



Nicoletta M. DiForte  
Deputy Director for Enforcement and Homeland Security  
Emergency and Remedial Response Division

Enclosure

## **Instructions for Responding to Request for Information**

### **A. Directions**

1. A complete and separate response should be given for each question. For each question contained in this letter, if information or documents responsive to this information request are not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Identify each answer with the number of the question and the subpart to which it responds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the question to which it applies.
3. Provide responses to the best of your company's ability, even if the information sought was never put down in writing or if the written documents are no longer available. Consult with all present and past employees and agents of your company whom you have reason to believe may be familiar with the matter to which the question pertains.
4. In answering each question, identify each individual and any other source of information (including documents) that were consulted in the preparation of the response to the question.
5. If additional information or documents responsive to this Request becomes known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that your company supplement its response to EPA within 30 days from the date such information or documents became available to it.
6. If you have reason to believe that an individual other than one employed by your company may be able to provide additional details or documentation in response to any question, state that person's name, last known address, phone number, and the reasons for your belief.
7. If a document is requested but not available, state the reason for its unavailability. To the best of your ability, identify the document by author, date, subject matter, number of pages, and all recipients of the documents with their addresses.
8. If anything is omitted from a document produced in response to the Request for Information, state the reason for, and the subject matter of, the omission.
9. If you cannot provide a precise answer to a question, please approximate but, in any such instance, state the reason for your inability to be specific.
10. Whenever this Request for Information requests the identification of a natural person, or other entity, the person or entity's full name and present or last known address also should be provided.

11. Provide documents that support or help explain each of your answers to the Request for Information and indicate, in your answers, precisely which part of which document is pertinent to your answer.
12. If the information requested has previously been submitted to EPA, the response may detail exactly when and where that information was previously submitted to EPA (*i.e.*, the date of the submission, the recipient of the information, and the location of responsive information) in lieu of resubmitting the information.
12. Confidential Information: The information requested herein must be provided even though your company may contend that it includes confidential information or trade secrets. Your company may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. § § 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b).

If you make a claim of confidentiality for any of the information your company submits to EPA, your company must prove that claim. For each document or response your company claims is confidential, your company must separately address the following points:

1. the portions of the information alleged to be entitled to confidential treatment;
2. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
3. measures taken by your company to guard against the undesired disclosure of the information to others;
4. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
5. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
6. whether your company asserts that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of



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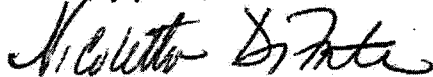
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Assistant Regional Counsel  
Office of Regional Counsel  
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Nicoletta M. DiForte  
Deputy Director for Enforcement and Homeland Security  
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4. In answering each question, identify each individual and any other source of information (including documents) that were consulted in the preparation of the response to the question.
5. If additional information or documents responsive to this Request becomes known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that your company supplement its response to EPA within 30 days from the date such information or documents became available to it.
6. If you have reason to believe that an individual other than one employed by your company may be able to provide additional details or documentation in response to any question, state that person's name, last known address, phone number, and the reasons for your belief.
7. If a document is requested but not available, state the reason for its unavailability. To the best of your ability, identify the document by author, date, subject matter, number of pages, and all recipients of the documents with their addresses.
8. If anything is omitted from a document produced in response to the Request for Information, state the reason for, and the subject matter of, the omission.
9. If you cannot provide a precise answer to a question, please approximate but, in any such instance, state the reason for your inability to be specific.
10. Whenever this Request for Information requests the identification of a natural person, or other entity, the person or entity's full name and present or last known address also should be provided.

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5. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
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To make a confidentiality claim, please stamp or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of



documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that your company satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that it is not and has not been obtainable by legitimate means without your company's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by Section 104(e) of CERCLA. If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to your company.

### **B. Definitions**

1. The term "person" shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.
2. The term "the Company," "Saint-Gobain Performance Plastics" or "SGPP" shall mean Saint-Gobain Performance Plastics and its predecessors, successors, subsidiaries, divisions, branches, officers, managers, employees, contractors, trustees, partners, assigns, or agents.
3. The term "hazardous substances" shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances, products or other nonhazardous substances.
4. The term "pollutant or contaminant" shall have the same definition as that contained in Section 101(33) of CERCLA, 42 U.S.C. § 9601(33), and includes any mixtures of such pollutants or contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included in this definition.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known employer and business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, occupation, position or business.
6. With respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) the term "identify" means to provide its full name, address, and affiliation with the individual and/or company to whom this request is addressed.
7. The term "document" and "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

8. The term "arrangement" means every separate contract or other agreement between two or more persons, whether written or oral.
9. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
10. The term "real estate" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.
11. The term "release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, and other closed receptacles containing any hazardous substance or, pollutant, or contaminant.
12. The term "PFC" refers to a perfluorinated chemical or fluoropolymer and includes, but is not limited to, fluorinated emulsifiers such as perfluorooctanoic acid (PFOA) and salts thereof.
13. The term "PFC-producing material" refers to any material that releases, generates or has PFC as a by-product or waste when subject to thermal, physical, or chemical processes.
14. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or the Resource Conservation and Recovery Act, as amended ("RCRA") 42 U.S.C. § 6901, et. seq., in which case the statutory definitions shall apply.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of

County of

I certify under penalty of law that I have personally examined and am familiar with the document submitted in response to EPA's Request for Information, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted document is complete and authentic unless otherwise indicated. I am aware that there are significant potential penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional or different information relevant to the matters addressed in EPA's Request for Information or the Company response thereto should become known or available to the Company.

\_\_\_\_\_  
NAME (print or type)

\_\_\_\_\_  
TITLE (print or type)

\_\_\_\_\_  
SIGNATURE

Sworn to before me this day  
of \_\_\_\_\_, 2016

Notary Public

### **Request for Information**

Please provide the following information for: i) the facility located at or about 14 McCaffrey Street in Hoosick Falls, New York; ii) the facility located at or about 1 Liberty Street in Hoosick Falls, New York; and iii) any other facility that is or has been owned or operated by the Company within a fifteen mile radius of Hoosick Falls, New York.

1. Identify each facility in which a PFC, PFC-containing or PFC-producing material is or was stored, used, processed, manufactured, managed, released or otherwise present (hereinafter collectively referred to as "handled"). Identify the specific PFC (for example, PFOA), PFC-containing or PFC-producing material that is or was handled at each such facility, and state the time period during which each PFC, PFC-containing or PFC-producing material was or has been handled at each such facility.
2. With respect to each facility, provide details indicating how each PFC, PFC-containing or PFC-producing material is or was handled, the quantity of PFC, PFC-containing or PFC-producing material handled on an annual basis, and the date such operations commenced and concluded.
3. Identify each facility which processes or processed fluoropolymers. Please provide details indicating how the fluoropolymers were processed, the quantity used on an annual basis, the dates such operations commenced and concluded, and the relationship of these processes to the presence of PFCs, PFC-containing or PFC-producing materials at the facility.
4. For each facility identified in response to Question 1:
  - a. state the correct legal name of the current owner and operator of the facility and the street and mailing address of the owner and operator;
  - b. indicate the date operations commenced at such facility, detailing the nature of the business and production processes presently conducted, as well as any past business and production processes that differ from those presently being conducted.
  - c. indicate whether the facility was previously owned or operated by another business entity and if so, identify each such entity, its relationship to SGPP (if any), the period when the entity owned or operated the facility, the nature of the operations conducted by the entity at the facility, and whether those operations including the handling of a PFC, PFC-containing or PFC-producing material and if so, how and which PFC material (e.g., PFOA).
5. If PFCs, PFC-containing, and/or PFC-producing materials are no longer being handled at the facilities identified in response to this request, please indicate what happened to any stockpiled PFC, PFC-containing and PFC-producing materials and the drums or containers that had been used to store it (e.g., were they cleaned and reused (if so, how) or discarded).

6. With respect to each facility, describe the manufacturing process(es) which utilized a PFC, PFC-containing or PFC-producing material either as a component employed in the formulation of an object, made for sale or use offsite or onsite, or as a reagent in the manufacturing process, or as an item utilized in maintenance activities. Indicate the specific PFC, PFC-containing and/or PFC-producing material involved, the time frames such manufacturing processes commenced and concluded at each facility.
7. With respect to each facility, indicate whether a PFC, PFC-containing or PFC-producing material was produced in the manufacturing process(es) employed onsite, including as a byproduct of the manufacturing process and/or as a production waste resulting from the manufacturing process, including through the processing of fluoropolymers. If so, state which PFC, PFC-containing and/or PFC-producing material was produced and during what time period this occurred. Summarize in a short narrative the equipment used to treat such waste materials, transport such waste materials or dispose of such waste materials. Indicate the time frames such manufacturing process(es) commenced and concluded, and the quantity of each PFC, PFC-containing and/or PFC-producing material produced on a monthly basis during this time period.
8. Describe the use of fluoropolymer dispersion, and indicate which facility(ies) use(d) this process. State which PFC, PFC-containing or PFC-producing materials were involved or produced. In addition, please detail the type of machinery employed, the location of the machinery, how the machinery and related apparatus were cleaned, and how residue or rinsate from the machinery was managed, treated and/or disposed of. If rinsate or residue was collected in drums, tanks settling pits or other units, please provide details regarding these units, including their location, periods of use, whether there were releases from these units, and how such releases were managed and/or remediated. Indicate the approximate date of commencement and conclusion of fluoropolymer dispersion operations at the facility(ies), and the quantity of fluoropolymers used on a monthly basis.
9. If production wastes that included a PFC, PFC-containing or PFC-producing material have been disposed onsite at any of the facilities, provide a map marked with the location of any or all such sites, state when each such disposal location was used for this purpose, and identify what specific PFC, PFC-containing and/or PFC-producing material was involved. Please indicate whether the disposal site has a liner, groundwater monitoring or other protective safeguards. Please provide any groundwater monitoring data and analytical reports associated with the disposal site.
10. With respect to each facility, indicate if a PFC, PFC-containing or PFC-producing material is or has been discharged directly into the sewer system. If so, please indicate which specific PFC, PFC-containing and/or PFC-producing material was involved and the time period during which this occurred, and provide a diagram indicating the location of the sewer(s) and the results of any sewer integrity investigations.

11. With respect to each facility, indicate whether a PFC, PFC-containing or PFC-producing material has been discharged into surface waters through outfalls that were permitted by a state or federal National Pollution Discharge Elimination System (NPDES) permit (or that were not permitted). Please explain the process leading to these discharges, the location of each point of discharge, the specific PFC, PFC-containing and/or PFC-producing material that was involved, and the time frames during which these discharges occurred. Provide copies of all such permits.
12. With respect to each facility, indicate whether a PFC, PFC-containing or PFC-producing material is or was stored in an underground or above-ground storage tank. If yes, please provide the following answers and all documents relevant to your responses:
  - a. Please supply the date when the tanks were installed, their size and material of construction, where they were installed, for what purpose, and which specific PFC, PFC-containing or PFC-producing material is or was stored in them.
  - b. Were any of these tanks ever removed or did they ever leak? If so, please provide details, including the time when this occurred.
13. Describe all leaks, spills, or other releases of a hazardous substance or pollutant or contaminant (including but not limited to PFOA) at or from each of the facilities. Your response should include but not be limited to the following information as to each such occurrence:
  - a. The date of the occurrence;
  - b. The specific location of the occurrence (indicate on a map);
  - c. The quantity of material leaked, spilled or released;
  - d. Steps taken to remediate or stop the release;
  - e. The specific hazardous substance, pollutant or contaminant that was involved, including the nature and composition of the material, and the physical state (solid, liquid, etc.) of such material; and
  - f. A copy of all documentation relating to the release.
14. With respect to each facility, indicate whether a PFC, PFC-containing or PFC-producing material is being, has been or may have been released from air emitting sources. If so, please identify each source and the specific PFC, PFC-containing and/or PFC-producing material involved, and provide any related air permits. Please explain the process leading to the emission of the PFC, PFC-containing or PFC-producing material, and the time frames during which these air emissions may have occurred. Provide any air monitoring reports and analytical data related to these air emissions.
15. Please provide copies of air models developed with respect to any of the facilities, including dispersion, photochemical or receptor models.
16. Please provide a list identifying all off-site disposal or treatment sites used by SGPP (or any

prior owner or operator of the facilities identified in response to Question 1) for any PFC, PFC-containing or PFC-producing material. The list should include the following information:

- a. the name and address of each such disposal or treatment site;
  - b. the time period the material was disposed and/or treated;
  - c. how the material was treated and/or disposed;
  - d. the specific PFC, PFC-containing or PFC-producing material involved;
  - e. the quantity, nature and composition of the material, and its physical state (solid, or liquid, etc.); and
  - f. any shipping documents, manifests or bills of lading prepared with respect to the off-site shipment of the materials.
17. EPA is aware that SGPP has arranged for a sampling and monitoring program with respect to PFOA at its McCaffrey Street facility in Hoosick Falls. Please provide all reports, analytical data, maps, and sampling plans and other work plans generated for or in connection with the sampling and monitoring program.
18. Does SGPP intend to take additional steps to further delineate the extent of PFOA contamination in soil and/or groundwater at or from the facility, and/or to remediate or control such contamination, and if so, what are the expected steps? Please provide details including the time frame for such investigation and/or remediation/control, and the proposed cleanup criteria for any remediation.
19. Has SGPP performed or arranged for sampling and/or monitoring for any PFCs at or near any of the other facilities identified in response to Question 1? If so, please identify which facility(ies), provide all reports, analytical data, maps, and sampling plans and other work plans generated for or in connection with the sampling and monitoring program, and indicate if and when SGPP intends to expand its sampling program at or near these facilities to further delineate the extent of PFC contamination.
20. Provide a map which shows all monitoring wells installed at or near each of the facilities identified in response to Question 1. In addition, give the identification system used to identify each monitoring well, state the purpose for which each well was or is being used and, to the extent not already provided in response to the above questions, provide the analytical results obtained from all monitoring conducted at each of the wells.
21. Provide a map which shows all pumping wells installed at or near each of the facilities identified in response to Question 1. In addition, give the identification system used to identify each pumping well, state the pumping rate, number of hours each well is pumped on a twenty-four hour cycle, and the depth and size of the each well screen. In addition, please provide all boring logs and analytical results from soil samples taken at each well location.

22. Has SGPP (or a consultant on its behalf) sampled the Hoosick River's waters, sediments, fish or other marine life for any PFC? If so, please summarize the sampling conducted and results found. Provide all sampling reports.
23. To the extent not already provided in response to the above questions, please submit all reports and analytical data from the sampling of soils, sediments, groundwater, surface water, or marine life at or near any of the facilities identified in response to Question 1, along with maps showing the respective sampling locations.
24. With the exception of the TSCA December 30, 2014 notification to EPA, please provide a copy of all notifications to governmental authorities regarding the presence or release of PFC, PFC-containing or PFC-producing materials at or from each facility identified in response to Question 1.
25. Please describe any actions that SGPP has taken, paid for and/or plans to take or pay for to address the threat of human exposure to PFCs in Hoosick Falls, and the time period of those actions.
26. Please provide a list of all entities which have supplied a PFC, PFC-containing or PFC-producing material to any of the facilities identified in response to Question 1. Identify the type of materials supplied, the quantity of each material received on an annual basis from each supplier.
27. What is the corporate or legal relationship between Saint-Gobain Performance Plastics, Saint-Gobain Corporation, the Saint-Gobain Group, and Compagnie de Saint-Gobain SA? In addition, if Saint-Gobain Performance Plastics is not itself incorporated, then explain what its legal form is and state what corporation it is a part of.
28. What is the direct or indirect corporate or legal relationship, if any, between each of the entities identified in Question 27 and the following entities: (i) Fluorglas; (ii) AlliedSignal Inc.; (iii) AlliedSignal Laminate Systems Inc.; (iv) Furon Co.; (v) Oak Materials Group, Inc.; (vi) Norplex/Oak Inc.; and (vii) Norplex Oak Inc.? In addition, please provide a chronology showing the acquisitions and/or mergers involving these companies.
29. Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information. In addition, state whether this person has personal knowledge of the information in the answers provided.